

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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THEODORE THORSEN, CHRISTINE M.
THORSEN, AND DAVID M. THORSEN,
BOTH INDIVIDUALLY AND
DERIVATIVELY ON BEHALF OF
SONS OF NORWAY, INC.

Plaintiffs,

- against -

SONS OF NORWAY, INC., EIVIND HEIBERG,
DAN RUDE AND DAVID NESS,

Defendants.
----- X

CV 13-2572(PKC)(RML)


**NOTICE OF
MOTION TO DISMISS**

To: Frances Codd Slusarz, Esq.
The Slusarz Law Firm, L.L.C.
158 Greenwood Avenue, 2nd Floor
Bethel, CT 06801

PLEASE TAKE NOTICE that upon (i) Defendants' Memorandum of Law, dated August 2, 2013; (ii) the Affidavit of Dan Rude, sworn to July 23, 2013; (iii) the Affidavit of David Ness, sworn to August 1, 2013; (iv) the Affidavit of Eivind J. Heiberg, sworn to July 29, 2013 and (v) the Declaration of William A. Ruskin, dated August 1, 2013; Defendants Sons of Norway, Eivind Heiberg and Dan Rude, through their attorneys, Epstein Becker & Green, P.C., will move this honorable Court at the United States Courthouse, 225 Cadman Plaza East, Brooklyn, New York, 11201, on such date and at such time as the Court sets, for an Order, pursuant to Rules 12(b)(2) and 12(b)(6) of the Federal Rules of Civil Procedure, dismissing Plaintiffs' Complaint in its entirety, together with all other and further relief that this Court deem just and proper.

Dated: New York, New York
August 2, 2013

EPSTEIN BECKER & GREEN, P.C.

By: 
William A. Ruskin
Aime Dempsey

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New York, New York 10177-1211
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Attorneys for Defendants
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EIVIND HEIBERG and DAN RUDE
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